



BIDWELLS

# **IMPERIAL BUILDINGS HERITAGE STATEMENT**

---

## **Table of Contents**

|            |   |           |
|------------|---|-----------|
| <b>1.0</b> | <b>Introduction</b>                           | <b>3</b>  |
| <b>2.0</b> | <b>Legislation</b>                            | <b>5</b>  |
| <b>3.0</b> | <b>Methodology</b>                            | <b>13</b> |
| <b>4.0</b> | <b>Historic Development</b>                   | <b>16</b> |
| <b>5.0</b> | <b>Site Assessment</b>                        | <b>23</b> |
| <b>6.0</b> | <b>Heritage Assets</b>                        | <b>33</b> |
| <b>7.0</b> | <b>The Proposals and Assessment of Impact</b> | <b>43</b> |

# 1.0 Introduction

- 1.1 This heritage statement has been prepared on behalf of Farrer & Co to assess the impact of proposed new roof plant to Imperial Buildings, located to the rear of 66 Lincoln's Inn Fields, Camden.
- 1.2 The proposals assessed within this report are minor in nature, comprising the replacement of two large chillers at roof level with twelve smaller air conditioning units. The existing chillers are presently screened from view, and the intention of the proposals is to retain the existing screen so that there will be no visual impact to immediate, medium and long views of the building.
- 1.3 66 Lincoln's Inn Fields (Powis House) is a Grade II\* listed building, with the main façade orientated to the east facing towards the open area of Lincoln's Inn Field beyond. Imperial Buildings adjoins Powis House, with the main façade located on the western side, facing onto the busy Kingsway. The buildings were connected to one another in the 1980s but Imperial Buildings are not ancillary to No. 66 and as such are not considered to be listed in themselves. Notwithstanding this, the works are within the setting of the listed building and the Bloomsbury Conservation Area, which encompasses the townscape to the east of the site. The proposals themselves fall within the Kingsway Conservation Area, adjoining the Bloomsbury Conservation Area on its western boundary. As such it is important to demonstrate that the proposals will be undertaken in accordance with sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 1.4 It is noted that while the associated List Description describing Powis House includes the railings to the front of the property, the description does not reference the attached Imperial Buildings, further to this, the Kingsway Conservation Area Appraisal published by Camden Council, does not highlight Imperial Buildings as listed. As such, the location of the proposed works is not considered to impact upon the fabric of the listed building. By virtue of the proximity of the site to the listed building, an assessment of impact has been included within this report examining the impact of the proposals to the buildings setting.
- 1.5 This report will assess the heritage significance of the site as existing and examine the level of the site's contribution to the surrounding Heritage Assets. The information can then be used as a baseline to assess the impacts of the proposals. While it is acknowledged additional heritage assets are within the site's surroundings, such as 65 Lincoln's Inn Fields (Grade II\*) and Kingsway Chambers (Grade II), due to lack of intervisibility and location within the conservation area, the impact to these assets will be assessed as part of the impact to the respective conservation areas.

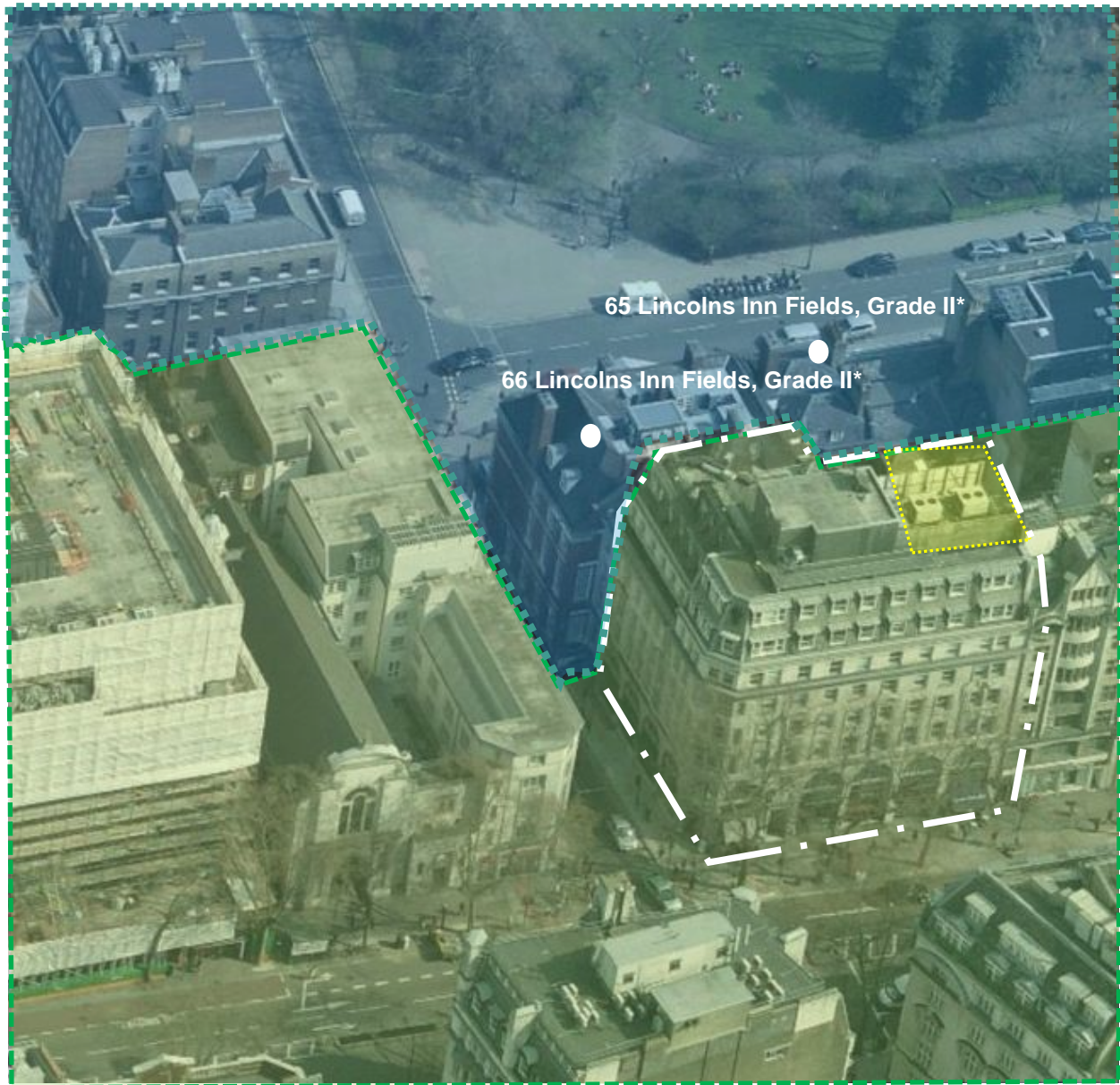


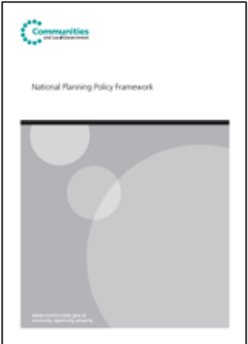
Figure 1. Location of the site and surrounding heritage assets. The dashed white line indicates the extent of Imperial Buildings and the yellow transparency shows the location of the proposals. The blue transparency shows the extent of the Bloomsbury Conservation Area, adjoining the Kingsway Conservation Area to the west, shown in green. 66 and 65 Lincoln's Inn Fields are labelled to the east.

## 2.0 Legislation

### Planning (Listed Buildings and Conservation Areas) Act 1990

- 2.1 The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Section 66(1) reads: *“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*
  - In relation to Conservation Areas, Section 72(1) reads: *“Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*

### National Planning Policy Framework (2018)

- 2.2 The revised National Planning Policy Framework (NPPF) was published on 24th of July 2018, replacing the previous published 2012 framework. With regard to the historic environment the over-arching aim of the policy remains in line with philosophy of the 2012 framework, namely that *“our historic environments... can better be cherished if their spirit of place thrives, rather than withers.”* The relevant policy is outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’.
- 
- 2.3 This chapter reasserts that heritage assets can range from sites and buildings of local interest to World Heritage Sites considered to have an Outstanding Universal Value. The NPPF subsequently requires these assets to be conserved in a *“manner appropriate to their significance”* (Paragraph 184).
- 2.4 NPPF directs local planning authorities to require an applicant to *“describe the significance of any heritage assets affected, including any contribution made by their setting”* and the level of detailed assessment should be *“proportionate to the assets’ importance”* (Paragraph 189).
- 2.5 Paragraph 190 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, *“to avoid conflict between the heritage asset’s conservation and any aspect of the proposal”*. This paragraph therefore results in the need for an analysis of the impact of a proposed development on the asset’s relative significance, in the form of a Heritage Impact Assessment.
- 2.6 Paragraph 193 requires that *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*
- 2.7 It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, *“clear and convincing justification”* (Paragraph 194). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to ‘wholly exceptional’ for those assets of the highest significance such as scheduled monuments, Grade I and grade II\* listed buildings or registered parks and gardens as well as World Heritage Sites.

2.8 In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 195 states the following:

*“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- a. the nature of the heritage asset prevents all reasonable uses of the site; and*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.”*

2.9 The NPPF therefore requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of proposals which would result in *“less than substantial harm”*, paragraph 196 provides the following:

*“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.”*

2.10 It is also possible for proposals, where suitably designed, to result in no harm to the significance of heritage assets.

2.11 In the case of non-designated heritage assets, Paragraph 197 requires a Local Planning Authority to make a *“balanced judgement”* having regard to the scale of any harm or loss and the significance of the heritage asset.

2.12 The NPPF therefore recognises the need to clearly identify relative significance at an early stage and then to judge the impact of development proposals in that context.

2.13 With regards to conservation areas and the settings of heritage assets, paragraph 200 requires Local Planning Authorities to look for opportunities for new development, enhancing or better revealing their significance. While it is noted that not all elements of a Conservation Area will necessarily contribute to its significance, this paragraph states that *“proposals that preserve those elements of a setting that make a positive contribution to the asset (or better reveal its significance) should be treated favourably.”*

### **Planning Practice Guidance (PPG) (2014)**

2.14 The Planning Practice Guidance (PPG) was published in March 2014 as a companion to the NPPF, replacing a large number of foregoing Circulars and other supplementary guidance. It is planned that this document will be updated to reflect the revised NPPF in due course however the following guidance remains relevant.

2.15 In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance, and explains how the tests of harm and impact within the NPPF are to be interpreted.



2.16 In particular, the PPG notes the following in relation to the evaluation of harm: *“In determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest.”* (Ref ID: 18a-017-20140306)

2.17 This guidance therefore provides assistance in defining where levels of harm should be set, tending to emphasise substantial harm as a *“high test”*.

### Historic England ‘Conservation Principles: Policies and Guidance’ 2008



2.18 Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of England’s historic environment, including changes affecting significant places. The guide sets out six high-level principles:

- *“The historic environment is a shared resource*
- *Everyone should be able to participate in sustaining the historic environment*
- *Understanding the significance of places is vital*
- *Significant places should be managed to sustain their values*
- *Decisions about change must be reasonable, transparent and consistent*
- *Documenting and learning from decisions is essential”*

2.19 ‘Significance’ lies at the core of these principles, the sum of all the heritage values attached to a place, be it a building, an archaeological site or a larger historic area such as a whole village or landscape. The document sets out how heritage values can be grouped into four categories:

- **“Evidential value:** *the potential of a place to yield evidence about past human activity*
- **Historic value:** *the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative.*
- **Aesthetic value:** *the ways in which people draw sensory and intellectual stimulation from a place*
- **Communal value:** *the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory”.*

2.20 It states that:

*“New work or alteration to a significant place should normally be acceptable if:*

- a. There is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;*
- b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;*

*c. the proposals aspire to a quality of design and execution which may be valued now and in the future;*

*d; the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future” (Page 58)”.*

### **Historic England Advice Note 2 ‘Making Changes to Heritage Assets’ (February 2016)**

2.21 This document provides advice in relation to aspects of addition and alteration to heritage assets:

*“The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting” (paragraph 41).*

### **Historic England: Historic Environment Good Practice Advice (GPA) in Planning Note 2 ‘Managing Significance in Decision-Taking in the Historic Environment’ (March 2015)**

2.22 This advice note sets out clear information to assist all relevant stake holders in implementing historic environment policy in the NPPF (NPPF) and the related guidance given in the National Planning Practice Guidance (NPPG). These include: *“assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness” (para 1).*

2.23 Paragraph 52 discusses ‘Opportunities to enhance assets, their settings and local distinctiveness’ that encourages development: *“Sustainable development can involve seeking positive improvements in the quality of the historic environment. There will not always be opportunities to enhance the significance or improve a heritage asset but the larger the asset the more likely there will be. Most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation”.*

### **Historic England The Setting of Heritage Assets Historic Environment Good Practice Advice (GPA) in Planning (second Edition) Note 3 (December 2017)**

2.24 This document presents guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas and landscapes. It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting. The suggested staged approach to taking decisions on setting can also be used to assess the contribution of views to the significance of heritage assets.

2.25 Page 2, states that *“the extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.”*

2.26 The document goes on to set out ‘A staged approach to proportionate decision taking’ provides detailed advice on assessing the implications of development proposals and recommends the



following broad approach to assessment, undertaken as a series of steps that apply equally to complex or more straightforward cases:

- *“Step 1 - identify which heritage assets and their settings are affected;*
- *Step 2 - Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;*
- *Step 3 - assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;*
- *Step 4 - explore ways to maximise enhancement and avoid or minimizing harm;*
- *Step 5 - make and document the decision and monitor outcomes.” (page 8)*

## **Regional Policy**

### **The London Plan: The Spatial Development Strategy for London consolidated with alterations since 2011 (2016)**

2.27 The London Plan sets out the overall strategic plan for the development of London until 2036. The document was published in March 2016. The most relevant policies are as follows:

2.28 **Policy 7.4 Local Character:**

*“Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area’s visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.*

*Buildings, streets and open spaces should provide a high quality design response that:*

- *has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass*
- *contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area*
- *is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings.*
- *allows existing buildings and structures that make a positive contribution to the character or a place to influence the future character of the area*
- *is informed by the surrounding historic environment”.*

2.29 **Policy 7.6 Architecture:**

*“Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context. Buildings and structures should:*

- *be of the highest architectural quality*
- *be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm*
- *comprise details and materials that complement, not necessarily replicate, the local architectural character*
- *not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings.*
- *incorporate best practice in resource management and climate change mitigation and adaption*

- *provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces*
- *be adaptable to different activities and land uses, particularly at ground level*
- *meet the principles of inclusive design*
- *optimise the potential of sites”*

## **Local Policy**

### **Camden Local Plan (2017)**

2.30 The Camden Local Plan is the principal document within the Camden Development Plan and was formerly adopted by the council on the 3<sup>rd</sup> July 2017. It establishes the council’s vision and policies which will guide development in the borough until 2031. The relevant policies within this document are:

#### **2.31 Policy D1: Design**

*“The Council will seek to secure high quality design in development. The Council will require that development:*

- a. respects local context and character;*
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;...*
- e. comprises details and materials that are of high quality and complement the local character;*
- f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;...*
- j. responds to natural features and preserves gardens and other open space;*
- k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping;...*
- m. preserves strategic and local views*

*The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions...*

#### *Excellence in design*

*The Council expects excellence in architecture and design. We will seek to ensure that the significant growth planned for under Policy G1 Delivery and location of growth will be provided through high quality contextual design.”*

#### **2.32 In terms of alterations and extensions, the complementary information for Policy D1 states:**

*“The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:*

- *character, setting, context and the form and scale of neighbouring buildings;*
- *the character and proportions of the existing building, where alterations and extensions are proposed;*
- *the prevailing pattern, density and scale of surrounding development;*

- *the impact on existing rhythms, symmetries and uniformities in the townscape;*
- *the composition of elevations;*
- *the suitability of the proposed design to its intended use;*
- *inclusive design and accessibility;*
- *its contribution to public realm and its impact on views and vistas; and*
- *the wider historic environment and buildings, spaces and features of local historic value”*

### **2.33 Policy D2: Heritage**

*“The Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.*

#### *Designated heritage assets*

*Designed heritage assets include conservation areas and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- a. the nature of the heritage asset prevents all reasonable uses of the site;*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.*

*The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.*

#### *Conservation areas*

*Conservation areas are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. In order to maintain the character of Camden’s conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will:*

- e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
- h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden’s architectural heritage.*

#### *Listed Buildings*

*Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed ‘designated heritage assets’. To preserve or enhance the borough’s listed buildings, the Council will:*

k. resist development that would cause harm to significance of a listed building through an effect on its setting....

#### Other heritage assets and non-designated heritage assets

The Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares.

The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset.”

## **Supplementary Guidance**

### **Kingsway Conservation Area Statement (2001)**

2.34 The Kingsway Conservation Area Appraisal was adopted by the council in December 2001 and contains policies to guide development in the area. The following guidelines are considered relevant:

#### **New Development**

2.35 K1

*“K1 Proposals should be guided by the UDP in terms of the appropriate uses. New development should be seen as an opportunity to enhance the Conservation Area and should respect the built form and historic context of the area, local views as well as existing features such as building lines, roof lines, elevational design, and where appropriate, architectural characteristics, detailing, profile, and materials of adjoining buildings”*

#### **Ventilation Ducts/Air handling Equipment**

2.36 K23

*“The erection of all external ventilation ducts and air handling equipment will require planning permission from the Council. In assessing these applications the Council will have regard to their placement, particularly where in visually sensitive locations and in the proximity of residential accommodation, to ensure local amenity is protected.”*

#### **Roof Extensions**

2.37 K24

*“Planning permission is required for alterations to the roof, at the front, rear and side, within the Conservation Area. In general, the rooflines of the 20th century buildings are unspoilt and form a very prominent characteristic of the conservation area. Despite some existing mansard extensions, roof extensions which fundamentally alter the roof form of buildings will not normally be permitted, although each proposal will be considered on its own merits. Particular care should be taken in the siting of roof top plant. This should be properly integrated into the roof form of buildings given the importance of the roofscape character in views. In all cases guidance in the SPG should be considered before preparing roof extension schemes.”*

## 3.0 Methodology

- 3.1 A heritage asset is defined within the NPPF as “a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).” (NPPF Annex 2: Glossary)
- 3.2 The significance of the heritage assets within the existing site requires assessment in order to provide a context for, and to determine the impact of, potential development proposals. Significance is defined as “the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.” (NPPF Annex 2: Glossary).
- 3.3 The aim of this Heritage Statement is to identify and assess any impacts that the proposed development may cause to the value or significance of surrounding heritage assets and/or their settings. Impact on that value or significance is determined by considering the sensitivity of the receptors identified and the magnitude of change.
- 3.4 Table 1 sets out thresholds of significance which reflect the hierarchy for national and local designations, based on established criteria for those designations. The Table provides a general framework for assessing levels of significance, but it does not seek to measure all aspects for which an asset may be valued – which may be judged by other aspects of merit, discussed in paragraphs 3.5 onwards.

*Table 1 - Assessing heritage significance*

| SIGNIFICANCE                | EXAMPLES  |
|-----------------------------|---|
| <b>Very High</b>            | World Heritage Sites, Listed Buildings and Scheduled Monuments of exceptional quality, or assets of acknowledged international importance or can contribute to international research objectives.<br><br>Grade I, Grade II* and Grade II Registered Parks and Gardens and historic landscapes and townscapes of international sensitivity.  |
| <b>High</b>                 | Grade I, Grade II* and Grade II Listed Buildings and built heritage of exceptional quality.<br><br>Grade I, Grade II* and Grade II Registered Parks and Gardens and historic landscapes and townscapes which are extremely well preserved with exceptional coherence, integrity, time-depth, or other critical factor(s).   |
| <b>Good</b>                 | Scheduled Monuments, or assets of national quality and importance, or that can contribute to national research objectives.<br><br>Grade II* and Grade II Listed Buildings, Conservation Areas with very strong character and integrity, other built heritage that can be shown to have good qualities in their fabric or historical association.<br><br>Grade II* and II Registered Parks and Gardens, Registered Battlefields and historic landscapes and townscapes of good level of interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s). |
| <b>Medium/<br/>Moderate</b> | Grade II Listed Buildings, Conservation Areas, locally listed buildings and non-designated assets that can be shown to have moderate qualities in their fabric or historical association.   |

|                      |   |
|----------------------|---|
|                      | Grade II Registered Parks and Gardens, Registered Battlefields, non-designated special historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).   |
| <b>Low</b>           | Assets compromised by poor preservation integrity and/or low original level of quality of low survival of contextual associations but with potential to contribute to local research objectives.<br><br>Historic buildings or structures of low quality in their fabric or historical association. Locally-listed buildings and non-designated assets of low quality.<br><br>Historic landscapes and townscapes with modest sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations. |
| <b>Negligible</b>    | Historic buildings or structures which are of limited quality in their fabric or historical association. Historic landscapes and townscapes of limited sensitivity, historic integrity and/or limited survival of contextual associations.  |
| <b>Neutral/ None</b> | Assets with no surviving cultural heritage interest. Buildings of no architectural or historical note.<br><br>Landscapes and townscapes with no surviving legibility and/or contextual associations, or with no historic interest.  |

3.5 Beyond the criteria applied for national designation, the concept of value can extend more broadly to include an understanding of the heritage values a building or place may hold for its owners, the local community or other interest groups. These aspects of value do not readily fall into the criteria typically applied for designation and require a broader assessment of how a place may hold significance. In seeking to prompt broader assessments of value, Historic England's Conservation Principles categorises the potential areas of significance (including and beyond designated assets) under the following headings:

*Evidential value – 'derives from the potential of a place to yield evidence about past human activity...Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them...The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.'* (Conservation Principles Page 28)

3.6 Evidential value therefore relates to the physical remains of a building/structure and its setting, including the potential for below ground remains, and what this primary source of evidence can tell us about the past.

*Aesthetic Value – 'Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects... Aesthetic values tend to be specific to a time cultural context and appreciation of them is not culturally exclusive'.* (Page 30-31)

3.7 Aesthetic value therefore relates to the visual qualities and characteristics of an asset (settlement site or building), long views, legibility of building form, character of elevations, roofscape, materials and fabric, and setting (including public and private views).

*Historic Value – 'derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative... Association with a notable family, person, event, or movement gives historical value a particular resonance...The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances.*



*Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value.’ (Page 28-30)*

- 3.8 Historic value therefore relates to the age and history of the asset, its development over time and the strength of its tie to a particular architectural period, person, place or event. It can also include the layout of a site, the plan form of a building and any features of special interest.

*Communal Value – “Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it... Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them... They may relate to an activity that is associated with the place, rather than with its physical fabric... Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there.” (Page 31-32)*

- 3.9 Communal value therefore relates to the role an asset plays in a historic setting, village, town or landscape context, and what it means to that place or that community. It is also linked to the use of a building, which is perhaps tied to a local industry or its social and/or spiritual connections.

- 3.10 Historic England’s Conservation Principles also considers the contribution made by setting and context to the significance of a heritage asset.

- *“‘Setting’ is an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape.”*
- *“‘Context’ embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places.” (Page 39)*

- 3.11 In order to understand the role of setting and context to decision-making, it is important to have an understanding of the origins and evolution of an asset, to the extent that this understanding gives rise to significance in the present. Assessment of these values is not based solely on visual considerations, but may lie in a deeper understanding of historic use, ownership, change or other cultural influence – all or any of which may have given rise to current circumstances and may hold a greater or lesser extent of significance.

## 4.0 Historic Development

- 4.1 The section will examine the historic development of the site and surroundings, focussing on the location of the proposals at roof level in particular.
- 4.2 The history of the site is closely related to the history of Kingsway road itself. The site and immediate surroundings remained largely unbuilt until the seventeenth century, with the first development of the area occurring to the north of the site along Great Queen Street. This was the first fully developed street undertaken by speculator William Newton, who was also responsible for the creation of the adjacent Lincoln's Inn Fields.
- 4.3 While proximity to the centre of London ensured the area remained fashionable and relatively well to do, successive infill development intensified the density of the area so that during the 19th century, overcrowding and poverty became the overwhelming characteristic of the surrounding streets. The character of the site at this time is shown in the map of 1875. This shows the axial route of Kingsway yet to be developed, with 66 Lincoln's Inn Fields clearly shown to the east and labelled, 'Powis House'. To the rear of Powis House, a succession of buildings to the west along the eastern termination of Great Queen Street creates a dense built environment.
- 4.4 The London County Council (LCC), created in 1889, started to address the overcrowding of the area towards the end of the nineteenth century, redeveloping the terraced streets in the wider area surrounding the site. However, the site itself was not impacted until 1898, when the LCC agreed to a new road linking Vernon Place in the north to the Aldwych in the south. This resulted in the almost complete demolition of the medieval and seventeenth street layout to the site's surroundings. While some redevelopment in the location of the site is already visible by 1896, consolidating the plots to the rear of Powis House, this building along with the surrounding properties to the north and south, were completed cleared for development in the first few years of the twentieth century.
- 4.5 Kingsway was opened in 1905 by Edward VII. The surrounding plots were also under the control of the LCC, selling the land under a series of 90-year leases. Most of the buildings along the street were completed before 1914. While the conservation area appraisal notes that the site was completed by 1913, and is shown on the OS map of 1916. It is noted that the designs of the new buildings to Kingsway were carefully controlled, with an attempt to introduce order and coherence by establishing a new, grander and commercial scale and character to the streets, completed in a Beaux Arts Edwardian style.
- 4.6 Aerial photography from 1934 shows the grandeur of the completed building at 48-58 Kingsway, with the considerable foot print of Imperial Buildings dwarfing Powis House to the east. The roofline is clearly visible in the image, comprising a large mansard housing a double row of dormers. Also visible is a large projecting massing, possibly chimneys or even a lift overrun.
- 4.7 The latter half of the twentieth century has seen a successive wave of alteration to Imperial Buildings including at roof level. While 66 Lincoln's Inn Fields was listed in 1951, the continued alteration to the roof and shopfront of Imperial Buildings have been consented consistently without the need for listed building consent, having no impact to the listed building's significance.
- 4.8 These alterations have included (amongst others): the installation of a new shopfront in August 1979; The re-erection of an extract duct at rear from first to roof level, granted in March 1980; The installation of equipment at roof level and erection of vision screen in August 1985; The erection of a metal framed single storey structure at roof level to house a gas boiler in April 1986; The erection of an equipment cabin on the roof in October 1990; New shop front at 50-54 Kingsway, granted in February 2004.

4.9

In 1986, listed building consent was granted to break through the eastern party wall of Imperial Buildings. As such while the site has retained its decorative front, corner and return elevations, the roofscape has seen gradual and successive change.

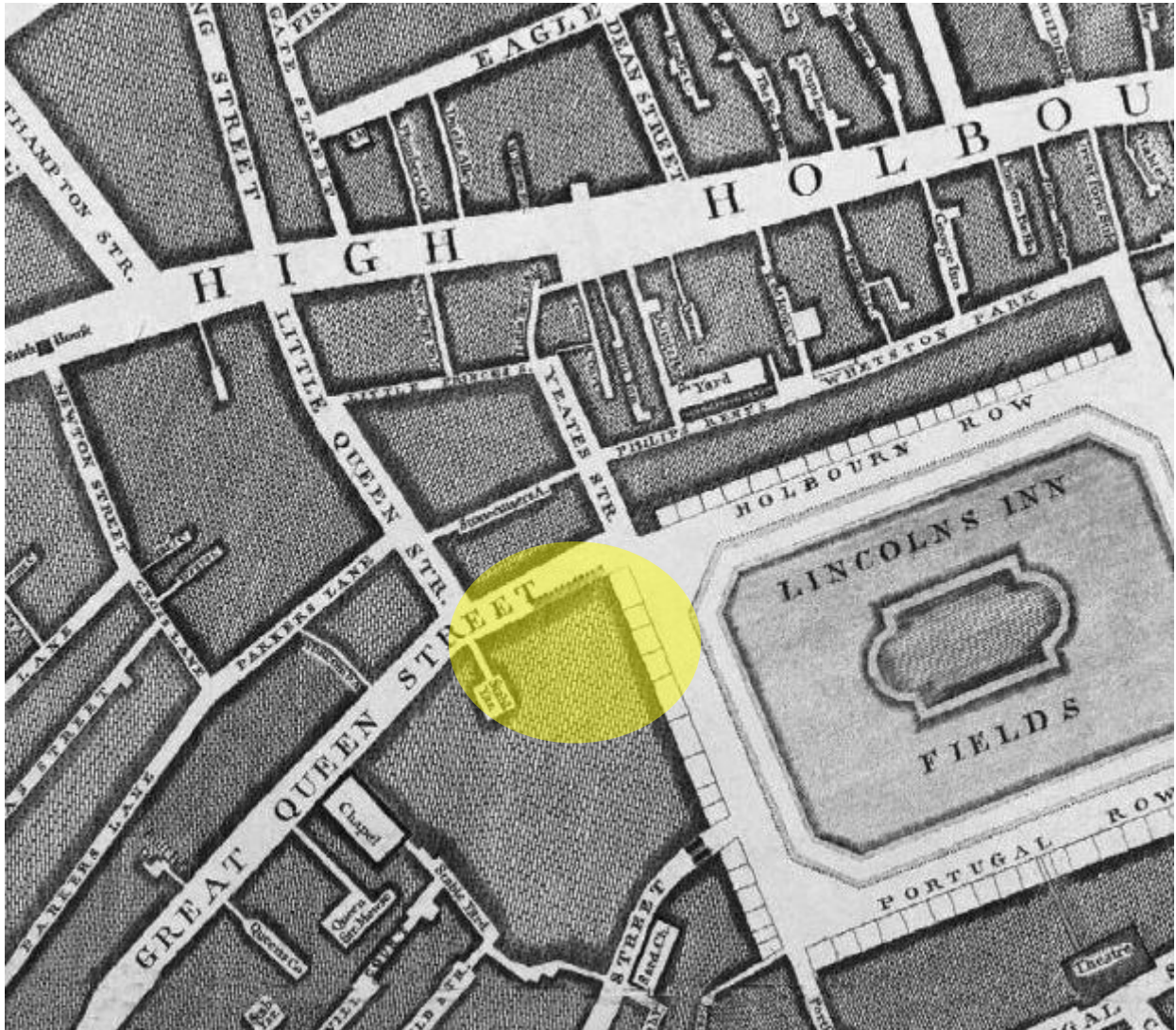


Figure 2. John Roque Map 1746. The approximate location of the site is indicated by the yellow circle.





Figure 3. 1875 OS Map. The approximate location of the site is indicated by the yellow circle. Note the axial route of Kingsway is yet to be developed. Powis House is however clearly labelled with a succession of buildings to the west along the eastern termination of Great Queen Street.

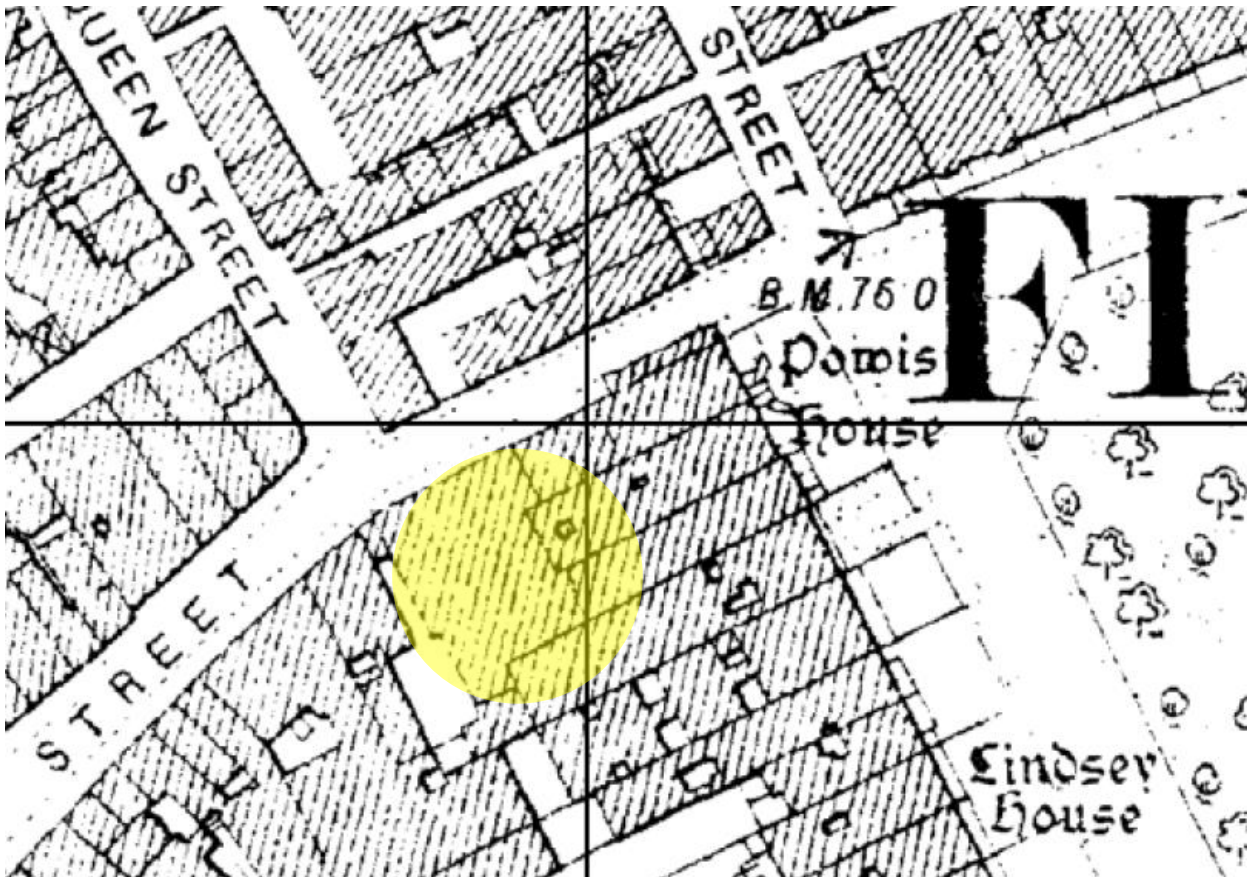


Figure 4. 1896 OS Map. Some redevelopment to the rear of Powis House can be seen, creating a single building foot print to the rear of three of the buildings facing onto Lincoln's Inn Fields.





Figure 5. Distant view of the site from High Holborn looking south, following the creation of Kingsway but prior to the redevelopment of the surrounding buildings. The approximate location of the site is indicated by the yellow circle.

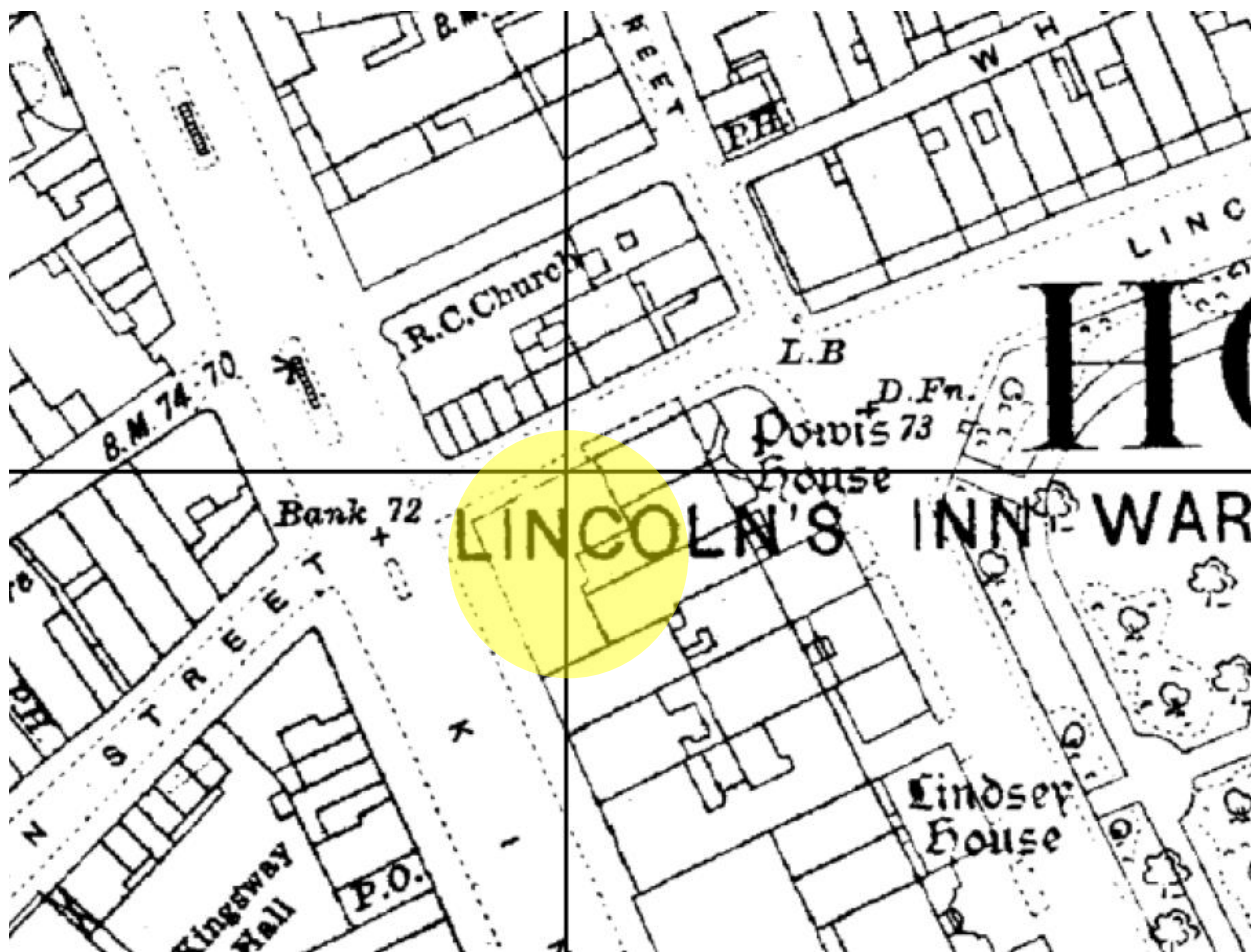


Figure 6. 1916 OS Map showing first cartographical evidence of the existing site.



Figure 7. Aerial view of the site from the north west, 1934. The site is complete by this date. Note the presence of additional massing to the roofscape at this time, just visible. The location of the site is indicated in yellow.

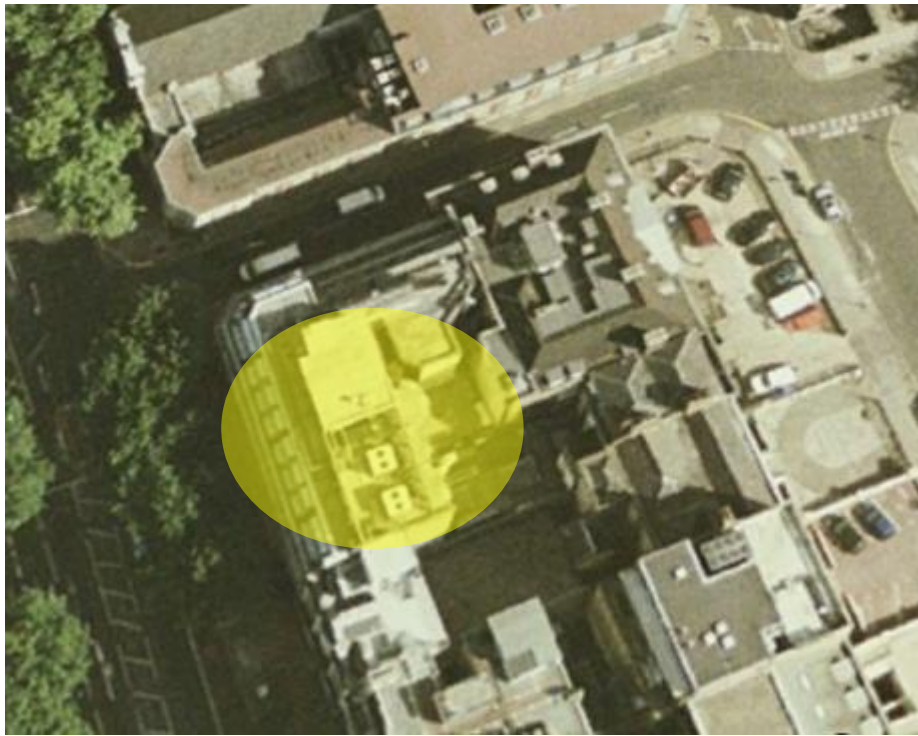


Figure 8. 1951 OS map. Location of the site is indicated in yellow. Note the building has now been subdivided





*Figure 9. Street photography of the site 1978, viewed from Kingsway to the west. Note plant work to roof, visible in this image.*



*Figure 10. Aerial photograph of the site, circa 1999. Note substantial plant work to roof, include screen erected in the 1980s. The location of the site is indicated by the yellow circle.*

## 5.0 Site Assessment

- 5.1 The location of the proposed works comprises a small area to the roof of Imperial Buildings. At present this area is enclosed by acoustic screening erected in the 1980s, with existing plant work located behind this screen. This area, by virtue of the set back away from the roof edge, as well as the existing screen is not visible from street level or from within the building interior. In addition, the screen also prevents views from the west, from the rear of 66 Lincoln's Inn, as well as from the open space of Lincoln's Inn Fields. Unlike the decorative main façade of Imperial Buildings, featuring Portland stone facing, rustication, sculpture to pediments as well as additional carved stone foliate and sway decorations, the location of the proposals makes no contribution to the aesthetic interest of the building, and is purely functional and utilitarian in character.
- 5.2 As noted within the historic development of the site, the roof level has undergone successive alteration, with plant work installed in waves throughout the twentieth century. Historic aerial and street photography has confirmed that the roof has always housed plant work of some type throughout its history. This is commensurate with the function of the building, intended to provide cutting edge office accommodation, positioning the new development of the Kingsway as the heart of London's business district.
- 5.3 The scale, massing, decorative detail as well as the use of the building clearly indicates an early twentieth century date of development, contrasting with the interior views from Lincoln's Inn Fields, where a seventeenth and eighteenth to nineteenth century character is more prevalent. As such Imperial Buildings do not respond to the architecture of 66 Lincoln's Inn Fields, dwarfing the older building and possessing its own grand façade to the west. While the party wall between the two buildings was opened in the late twentieth century, the site does not form part of the listed building, as consistently reflected in the building's planning history.
- 5.4 In summary the significance of the building, which has been identified as a positive contributor to the Kingsway conservation area resides primarily in its decorative main western façade as well as the corner and return elevation to Remnant Street. Its overall historic interest is limited by both successive internal alterations, as well as relatively low rarity value and lack of notable communal or evidential interest. The contribution of the existing roofscape to the significance of the building is presently neutral, given the consistent alteration and additions of plant work occurring successively throughout the twentieth century. The existing large screen surrounding the location of the proposals is such that there are no views of the plant work within the site from the surroundings.



*Figure 11. View south along the western boundary of Lincoln's Inn Fields. Note variety to the facades along the terrace as seen to the left wall as the blank character of the side façade of Powis House to the right, creating a formal hierarchy to the elevations. Note the location of the proposed works is not visible in this image.*





*Figure 12. View of Imperial Buildings seen from Kingsway to the west. Note view of existing screen to roof seen at street level, as well as the contrasting massing, scale, decorative character, materials and aesthetic of Imperial Buildings when compared to Powis House.*



*Figure 13. Decorative sculpture over entrance to Imperial Buildings. Note rustication of ground floor and use of Portland Stone facing to the facades.*





*Figure 14. Late twentieth century standardised office layout to the interior with suspended ceilings, strip lighting and secondary glazing throughout. These areas are without interest.*



*Figure 15. View of existing plant work to roof, note metal screen installed in the 1980s, preventing extensive views to and from the surroundings.*



*Figure 16. Existing AC units on the roof of the imperial buildings.*



*Figure 17. Detail view of existing screening to chiller units at roof level within the site.*





*Figure 18. View from the northern edge of the roof level within the site, looking towards the rear elevation of 66 Lincoln's Inn Fields. Lincoln's Inn Fields is just seen beyond.*





*Figure 19. Detailed view of roofscape within Bloomsbury Conservation Area. Note considerable amount of plant work when viewed at this level located within the immediate site surroundings.*

## 6.0 Heritage Assets

### 66 Lincoln's Inn Fields, Powis House

#### Historic Interest

- 6.1 The sale of the plot surrounding 66 Lincoln's Inn Fields was made in 1641 and the house is known to have been constructed by 1651, referred to as "the corner house of the west range" within the square. Following a fire in 1684, the house was rebuilt under the ownership of Earl Powis. This rebuilding work saw the reorientation of the upper rooms, facing northwards on pillars over Queen Street.
- 6.2 The rebuilding of the house is thought to have been overseen by the Dutch Captain William Winde. A plan survives from this period, showing a symmetrical, Palladian layout to the front with two projecting rear wings, creating a courtyard to the rear. However the house remained unfinished when Lord Powis was outlawed. The house was subsequently given over to be the official residence of the keepers of the great seal, with a survey undertaken by Sir Christopher Wren. His survey found the state of the building to be "very imperfect", with a "great part being without floors, ceilings, wainst or firehearths."
- 6.3 Together with carpenter Abraham Jordan, the house was altered, adding a 'cause-roume and offices." The interiors were also extensively redecored following these alterations, thought to have occurred in two phases during the eighteenth century, the remnants of which can still be seen in the usage of the peacock symbol, associated with the owning family of the time.
- 6.4 In 1771 however the house was subdivided in two, remaining split until 1904, when Sir William Farrer reunified the building into a single dwelling. This reunification work resulted in the changes to the entrance steps and within the lobby, at one time divided by a party wall, with two staircases behind. Following reunification works, the northern rear wing of the building was also demolished.
- 6.5 Photographs dating to the early twentieth century also indicated the removal and reinstatement of the pediment, reordering of the main entrance and reinstatement of carved stone crest to the upper floor and alteration to the roof. These alterations occurred during renovation works associated with Edward Lutyens and thought to have been completed circa 1930. The building was subsequently listed a few decades later in October 1951. In July 1986, a break in the rear party wall was consented.
- 6.6 In summary the historic interest of the building is **very high**, due to rarity value as a surviving seventeenth century house (albeit substantially altered). Additional associative historic value is also imparted through connection with Sir Christopher Wren, the Earl of Powis, Edward Lutyens and Sir William Farrer.

#### Aesthetic Interest

- 6.7 The overall appearance of the building reflects a Dutch influence and seventeenth century design aesthetic, with the compact, almost square, symmetrical brick main front, relatively tall tiled hipped roofscape with stone banding and quoin stones surrounds. Successive waves of rebuilding are however apparent, particularly within the central bay and roof. However the enriched cornice and pediment, replaced in the twentieth century, create a grand appearance commensurate with the corner position of the building, adjacent to the entrance into the square from the west. As noted the rear of the property has undergone the most dramatic alteration, reducing this façade's contribution to the aesthetic interest of the building. The roof presently houses a considerable amount of plant work, albeit completely screened from public views of the property. The resultant Aesthetic interest of the building is therefore **high**.

#### Communal Interest

- 6.8 As a private residential dwelling for the majority of its use, the building has **low** communal interest, with little commemorative value, limited to the associations with historic and present day communities that live and worked within the building.

#### Evidential Interest

- 6.9 The evidential interest of the building is **high** reflecting successive waves of construction techniques and materials, evolving from the seventeenth century to the present day.

#### Summary of Significance

The overall significance of the listed building is high, reflected its status as one of the earliest developments in the area and associations with some of the most notable architects of the last 500 years, Sir Christopher Wren and Sir Edward Lutyens.

#### Setting

- 6.10 The setting of the house is presently divided, with the relationship of the main eastern front to the open area of Lincoln's Inn Fields closely reflecting its historic setting, while contrastingly the townscape to the rear of the house is illustrative of the dramatic redevelopment of Kingsway in the early twentieth century.
- 6.11 The building however retains strong group value with the neighbouring properties to the south, as well as the northern arm of the square, seen to the north east. While the surrounding buildings reflect a variety of architectural styles and plot sizes, the shared character of a series of grand residential buildings remains, unified by a relative consistency of building line and height. The building has therefore retained the appearance of a grand residential dwelling, its grandeur reflected in the proximity to the open expanse of the park to the east.

#### Contribution of the Site to Significance

- 6.12 It is noted that the majority of views to the building from within the park take in the redevelopment to the west and north of the square. This includes glimpses of the roofscape of the twentieth century buildings to Kingsway. Within these views, glimpses of the site are prevented by both the oblique angle of sight lines as well as the substantial screen installed in the 1980s. The contribution of the site to the setting and significance of the listed building is therefore neutral, the interior entirely hidden from views of, to and from the property.

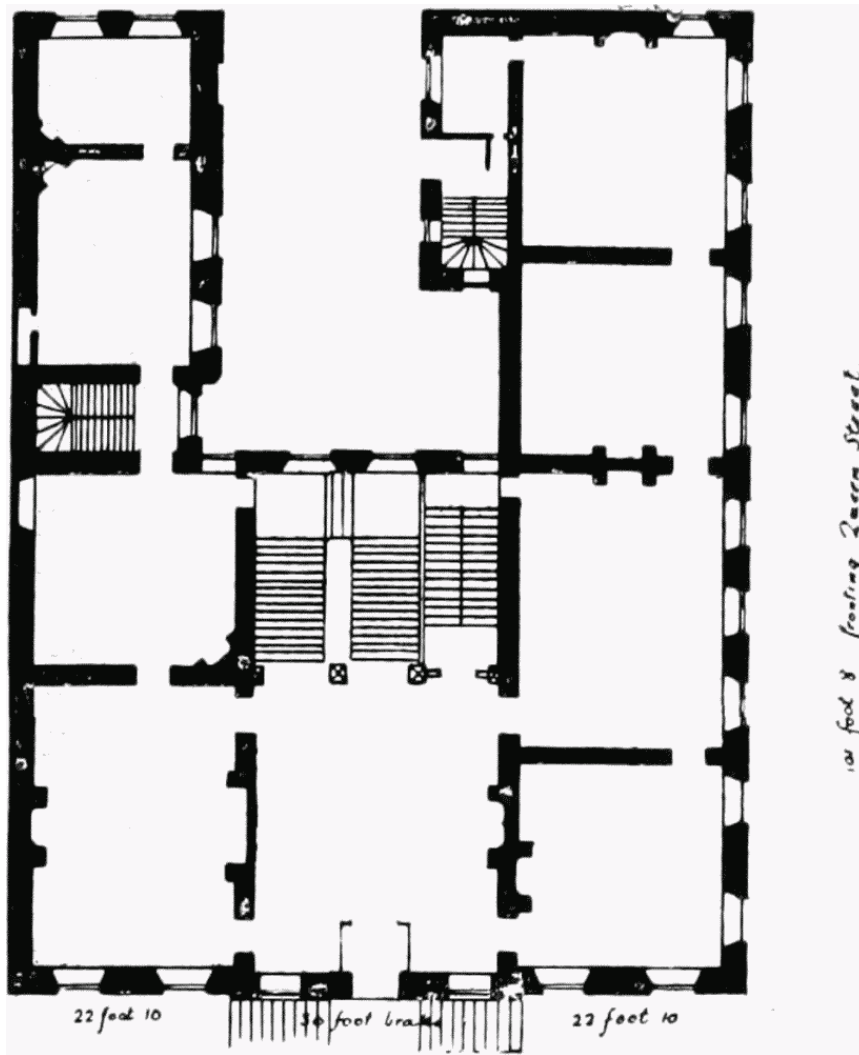


Figure 20. Ground Plan of 66 Lincoln's Inn Fields. Source: British History online.



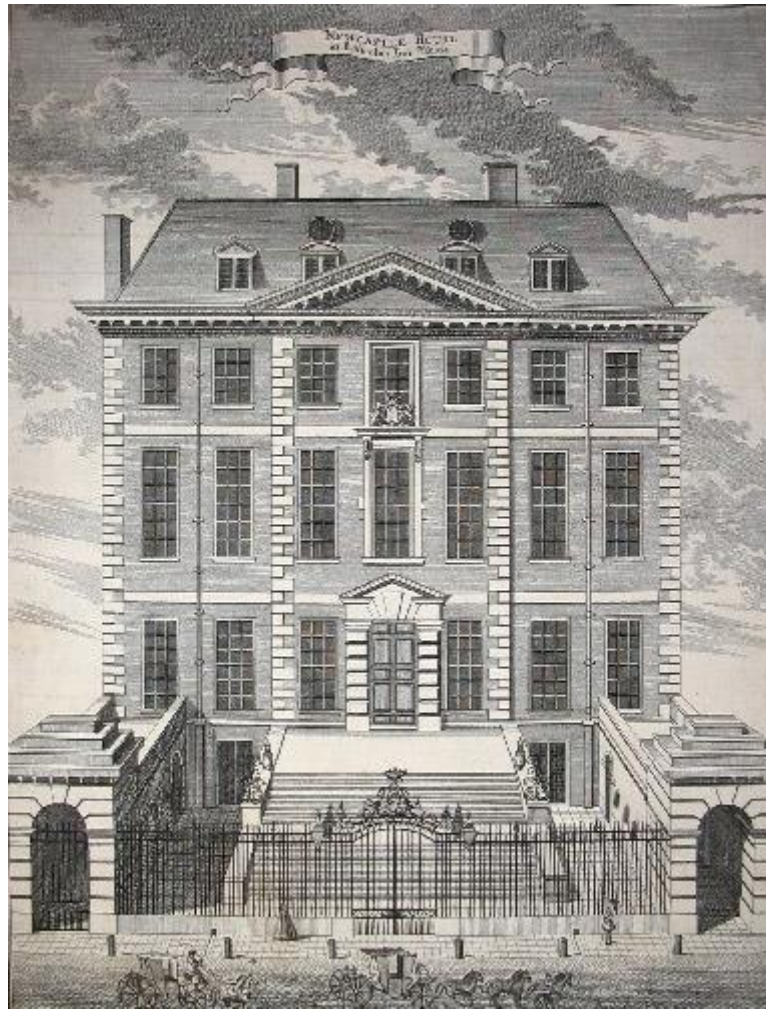


Figure 21. 1754 Engraving, Powis House, prior to later alteration. Source: British History Online. Note unified entrance steps, four casement dormers to roof, and three visible chimney stacks.

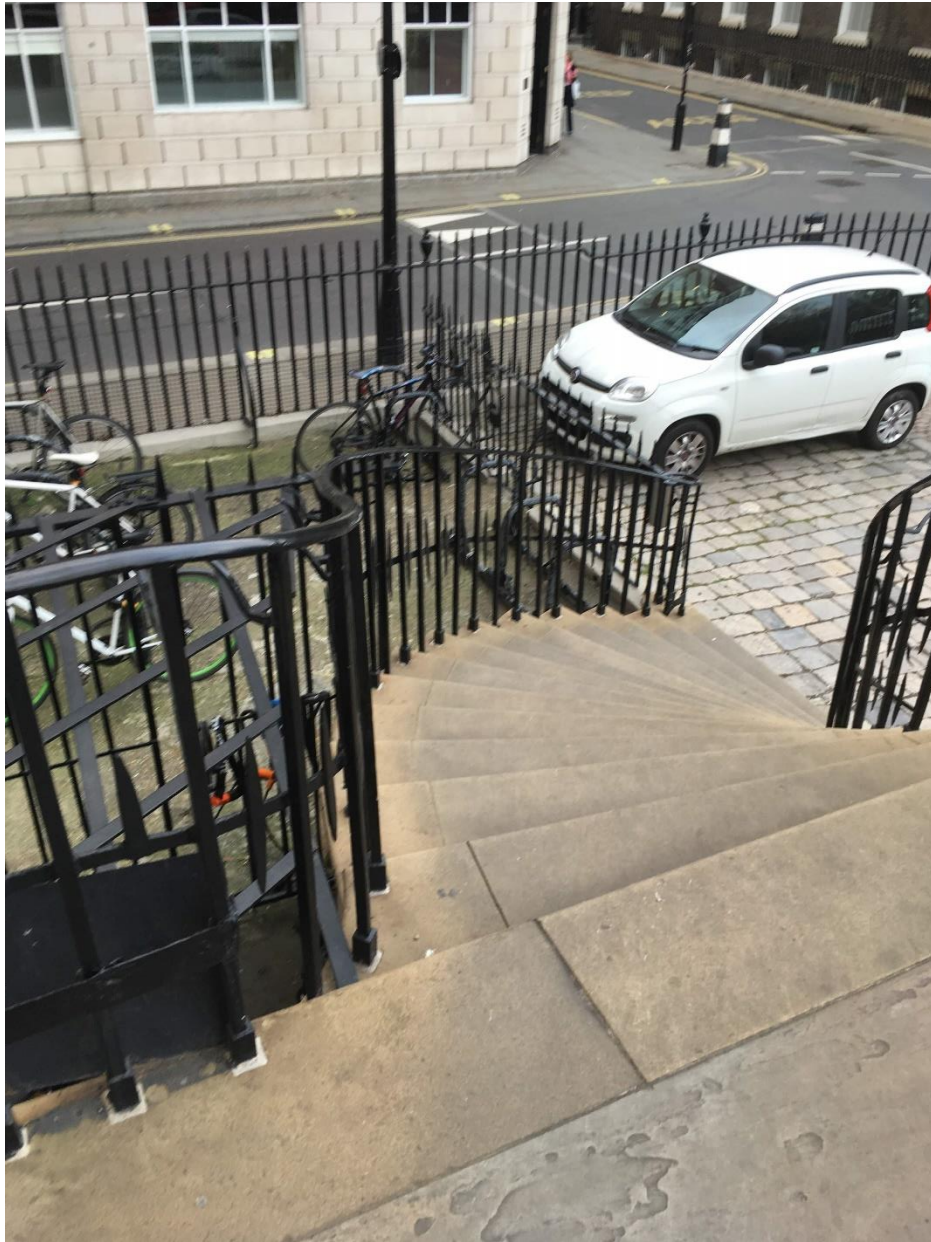


*Figure 22. Powis House, 1924. Note development of central bay of the main façade including division of entrance steps and the loss of the central pediment.*



*Figure 23. Main eastern façade of 66 Lincoln's Inn Fields, Grade II\*. Note the roofscape of 48-58 Kingsway is not visible in this image.*





*Figure 24. Altered stone steps accessing the park from the eastern main façade.*





*Figure 25. Decorative plaster moulding to interior, indicative of eighteenth century design.*



*Figure 26. View of the site from Lincoln's Inn Fields. Note the screen surrounding the site, installed in the 1980s prevents through views into the site itself, alongside the oblique angle of views from the park.*



## Bloomsbury Conservation Area

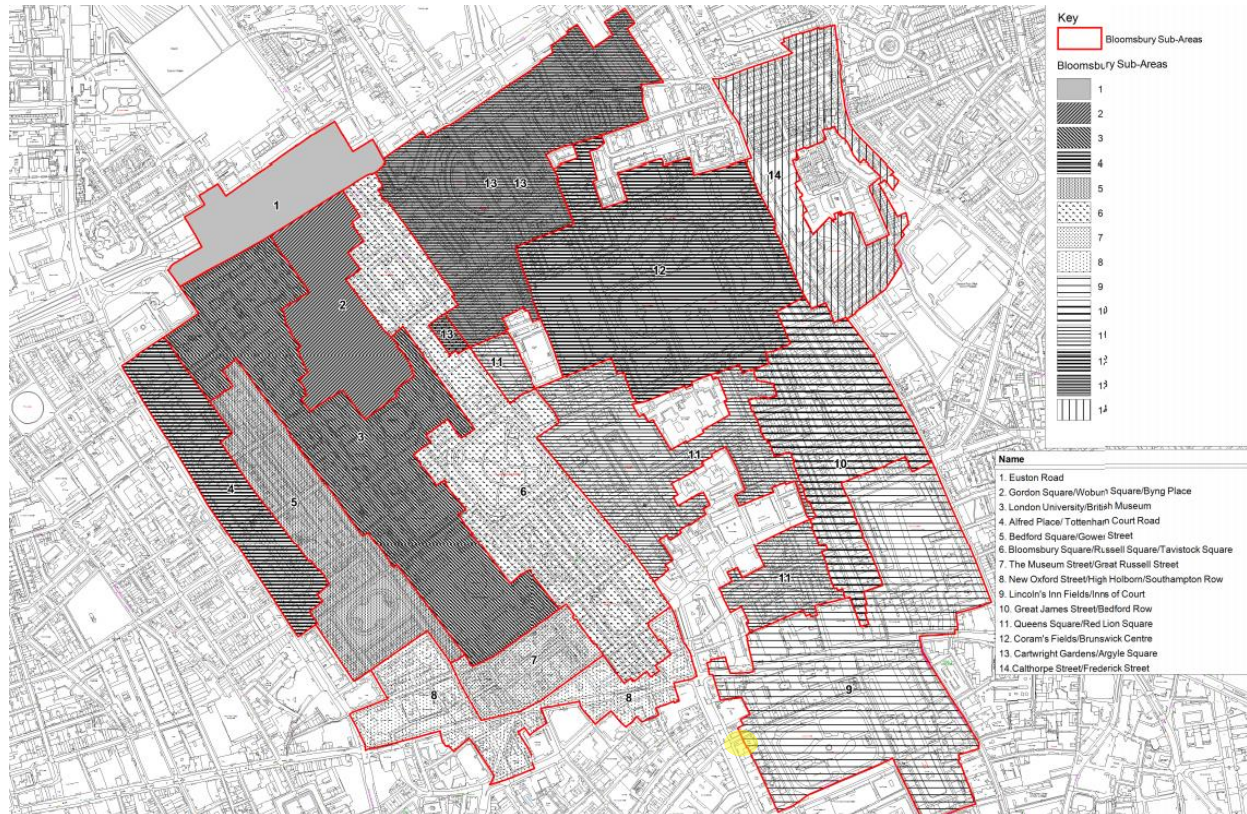


Figure 27. Map of the conservation area. The site can be seen to fall just outside the southern boundary of the area, adjacent to sub area 9. Location of the site is indicated by the yellow circle.

- 6.13 First designated in 1968, the character of the Bloomsbury Conservation Area is described within the Appraisal and Management Strategy document, adopted by the council in April 2011. This shows the site to fall just to the west of sub-area 9, which reflects the development surrounding Lincoln's Inn Fields, as well as the inns of court to the north east. The wider area of Bloomsbury is noted for its formally planned arrangement of streets and squares, expressing a distinctive hierarchy to the street scape and commonly comprised of terraced town houses of unified design. Lincoln's Inn Fields however has retained a distinctive quality, reflecting its relatively early formation, with many structures retaining their early 'courtyard' developments ground plan, with formal frontages facing the square.
- 6.14 The character of the square is therefore defined by a sense of enclosure, with a varied streetscape reflecting changing fashions in architectural style, materials and decoration as the square was slowly redeveloped overtime in piecemeal fashion. The gardens themselves were laid out in the mid-17th century. The large scale of the central gardens, bordered by a wide roadway on all sides, imbuing a sense of openness creating long views on all sides.
- 6.15 As seen within figure 24 the location of the proposals is not visible within short, medium or long range views of the conservation area interior, obscured by the oblique angle as well as the existing screening erected in the 1980s. The contribution of the location of the proposals to the character and special interest of the conservation area is therefore **neutral**.

## Kingsway Conservation Area



Figure 28. Conservation Area Boundary, the location of the site is indicated by the yellow transparency.

- 6.16 First designated in 1981, the character of the Kingsway Conservation Area, is defined within the Conservation Area Statement, adopted in December 2001. The area is defined by the dramatic views created north south along the axial Kingsway. As shown within the historic development section this road completely transformed the surrounding townscape, creating a uniform turn of the century architectural character.
- 6.17 This character largely persists with relatively tall prestigious commercial buildings, faced in Portland Stone and exhibiting neo-classical decorative detail, lining either side of the street. The buildings also have a consistent use, with shops to the ground floor and offices above. The roofscape is noted in the appraisal for the variation of massing, containing, “many interesting parapet and cornice details, attic storeys, dormers, domes, turrets and pieces of sculpture.” Glimpses along side streets, such as Remnant Street to the north of the site identified as of interest, primarily due to the revelation of contrasting townscapes and open areas beyond.
- 6.18 Imperial Buildings themselves are identified within the appraisal as having an overall ‘positive contribution’ to the character and appearance of the conservation area. This contribution includes that of the location of the development proposals, presently screened from view by the hoarding added to the building in the 1980s. As shown within the historic development section, the roof level of Imperial Buildings have undergone the greatest change, with the successive instillation of plant work throughout the twentieth century. Nevertheless the majority of these plant works are screened from view, leaving the decorative main façade of the building intact. The location of the proposed development is therefore not seen in views from the surrounding townscape.



## 7.0 The Proposals and Assessment of Impact

- 7.1 The section will assess the impact of the proposed development on the significance of the heritage assets identified. This section should be read in conjunction with the full drawing pack included within this application. The proposals are very minor in nature, comprising the replacement of two existing large chillers at roof level, with twelve smaller air condition units. As seen from the site assessment, the location of the proposed works is imperceptible from the surroundings, screened by hoarding used as an acoustic shield, consented in the 1980s.
- 7.2 The replacement of the existing plant work is therefore found to have no visual impact on the surrounding identified heritage assets, including Powis House and the Bloomsbury and Kingsway Conservation Areas. Notwithstanding this, it is noted that the proposed plant work is smaller in bulk than the existing chillers, constituting a minor improvement.
- 7.3 This report has determined that the location of the proposals has undergone successive consented works, occurring throughout the twentieth century and as such represents one of the most altered parts of Imperial Buildings. Therefore, while the proposed works are in proximity to the Grade II\* listed Powis House, it has been established that the location of the proposals presently makes no contribution to the surrounding heritage assets. It is subsequently considered that the proposed air-condition units, which will be similarly screened by the existing hoarding, will remain imperceptible in existing views between the two buildings, as well as from street level. The proposals therefore have no impact to the historic fabric, setting or overall significance of the host building, or surrounding designated heritage assets. While views of the existing screening can be seen from both conservation areas, the proposals will in no way affect current views of the site.
- 7.4 As such the proposals are considered to be compliant with the NPPF and relevant local policy as well as section 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, resulting in no harm to the significance of the heritage assets identified.





# APPENDIX A

## LISTED BUILDING DESCRIPTIONS

---

### POWIS HOUSE AND ATTACHED RAILINGS

Heritage Category: Listed Building

Grade: II\*

List Entry Number: 1379336

Date first listed: 24-Oct-1951

Date of most recent amendment: 11-Jan-1999

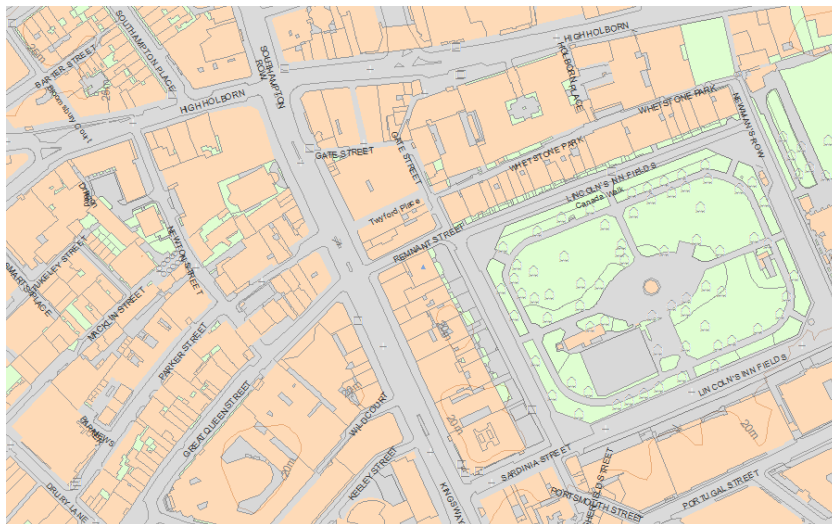


Figure 31. Location Map. Source: Historic England.

House. c1685. Designed by William Winde. For the Marquis of Powis. Craftsman, A Jordan. Exterior rebuilt by Lutyens c1930 following C17 style. Interior from c1772 when the house was divided into two parts, probably by Thomas Leverton. Brown brick, red brick and stone dressings with rusticated stone quoins. Stone semi-basement, bands to each floor, dentil and modillion cornice. Tiled hipped roof with pedimented dormers and stone dressed chimney-stacks. EXTERIOR: 3 storeys, attic and semi-basement. 7 windows with projecting, central, pedimented 3 window bay. 2-leaf entrance doors with flanking rusticated pilasters carrying entablature with open pediment; approached by twin quadrant flights of steps with wrought-iron railings and overthrow lamp-holder. Gauged flat brick arches to slightly recessed sash windows with exposed boxing; centre second floor window with stone architrave surmounted by stone cherubs holding cartouche. Window above with stone architrave. North end of house returned over arcade of brick arches on pavement to Remnant Street. INTERIOR: good, with C19 open well staircase, panelled rooms, enriched doorcases and other features. Only internal feature which might date to C17 is the carved marble chimney piece on the second floor. SUBSIDIARY FEATURES: attached cast-iron railings with urn finials to cobbled forecourt. (RCHME: London, Vol. II, West London: London: -1925: 59-60; Survey of London: Vol. III, St Giles-in-the-Fields, part I, Lincoln's Inn Fields: London: 1912: 110-118).